

MEMO ENDORSED

GOTTLIEB & ASSOCIATES PLLC
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March 7, 2024

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Young v. Morehouse College, Inc.*,
Case No.: 1:23-cv-10110

Dear Judge Caproni,

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 03/07/2024

The undersigned represents Leshawn Young, on behalf of herself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Morehouse College, Inc., (“Defendant”). The undersigned respectfully requests that the Initial Conference scheduled for March 15, 2024, at 10:00 AM (Dkt. 6) be adjourned for 60 days as well as the Defendant’s time to respond to the Complaint because Counsel for Defendant has not yet appeared. By way of background, the Complaint, Summons, and Your Honor’s Order (Dkt. 6) were properly served on the Defendant on December 12, 2023 (Dkt. 7). Subsequently we e-mailed courtesy copies to the Defendant’s administration on January 1, 2024 and to Defendant’s General Counsel on February 7, 2024. We have been diligently attempting to contact the Defendant and will continue these efforts so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for Defendant’s Counsel to appear and discuss a possible resolution with Plaintiff’s Counsel. In the event that this request is granted, the undersigned respectfully requests a telephonic initial pretrial conference due to my disability. This is the Plaintiff’s first request for an extension.

Thank you for your attention to this matter. Should the Court have any questions, please do not hesitate to contact the undersigned attorney.

cc: via email Craig Burgess
craig.burgess@morehouse.edu
Morehouse College General Counsel

Respectfully submitted,
GOTTLIEB & ASSOCIATES PLLC
/s/Jeffrey M. Gottlieb, Esq.
Jeffrey M. Gottlieb, Esq.

The initial pretrial conference is ADJOURNED sine die. Defendant's deadline to answer or otherwise respond to the Complaint remains **March 15, 2024**. If Defendant does not answer or otherwise respond by this date, Plaintiff's deadline to move for default judgment according to the procedures set forth in the Undersigned's Individual Practices is **March 20, 2024**. Plaintiff is ordered to file proof of service of this order on Defendant by **March 8, 2024**.

Plaintiff's counsel is reminded that, pursuant to Rule 2(C) of the Undersigned's Individual Practices, all extension or adjournment requests must be made at least 48 hours prior to the original due date. Plaintiff's letter was filed on the date that the pre-conference submissions were due. Plaintiff's counsel is warned that further extension or adjournment requests made in violation of the Undersigned's Individual Practices may be denied on that basis alone.

SO ORDERED.



03/07/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE